



Ex Kano S. Sams II
esams@glancylaw.com
1925 Century Park East, Suite 2100
Los Angeles, CA 90067
T: 310.201.9150

October 13, 2022

VIA ECF

The Honorable Jesse M. Furman
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Enrique Africa v. Jianpu Technology Inc. et al.*, Case No. 1:21-cv-01419-JMF

Dear Judge Furman:

We represent Lead Plaintiff Enrique Africa (“Plaintiff”) in the above-referenced action. We write regarding the Court’s September 28, 2022 Opinion and Order (“Order”), in which the Court granted Defendants’ motion to dismiss Plaintiff’s operative complaint with leave to amend.

I. INTRODUCTION

Within the Court’s Order, the Court stated that Plaintiff shall file any amended complaint within thirty days of the date of the Order, which would be on or before October 28, 2022. In accordance with Paragraphs 2(E) and 4(A) of the Court’s Individual Rules and Practices in Civil Cases, Plaintiff submits this letter-motion to respectfully request an extension of 30 days to file an amended complaint pursuant to the Court’s Order.

II. ARGUMENT

Plaintiff respectfully requests an extension because Counsel for Plaintiff currently have several matters with intervening obligations that would conflict with the current deadline in this matter. Such matters include, but are not limited to, drafting a reply brief for a motion for class certification due October 18, 2022, preparation for a hearing on October 20, 2022, drafting an appellate brief due on November 10, 2022, drafting an amended complaint in one matter due October 28, 2022, and drafting an amended complaint in another matter with a deadline of December 13, 2022. One attorney of record also recently had a death in the family which required his travel to services on October 10th and 11th. Plaintiff has not previously requested an extension

The Honorable Jesse M. Furman

October 13, 2022

Page 2

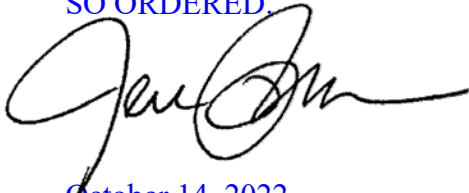
with respect to this amended complaint, there is no current scheduled appearance before the Court, and there are no other existing deadlines. Courts, moreover, have commonly granted such requests. *See, e.g., DeJesus-Vasquez v. Bethencourt*, No. 19-CV-967 (KMK), 2021 WL 3540553, at *1 (S.D.N.Y. Aug. 10, 2021) (noting that “the Court granted Plaintiff’s request for an extension of time” to file an amended complaint and that the Court subsequently “provided Plaintiff a further extension of time”); *Muhammad v. Annucci*, No. 19CIV3258GBDOTW, 2020 WL 1303571, at *4 (S.D.N.Y. Mar. 19, 2020) (“Plaintiff filed a letter requesting an extension of time to file his amended complaint . . . his request for an extension of time to file an amended complaint . . . is GRANTED.”). Counsel for Plaintiff has conferred with counsel for Defendants regarding this request, and counsel for Defendants stated that Defendants take no position on this request.

III. CONCLUSION

Accordingly, Plaintiff respectfully requests a deadline of Monday, November 28, 2022 to file an amended complaint (a 30-day extension deadline would fall on Sunday, November 27, 2022). We thank the Court very much for considering this request.

Application GRANTED. The Clerk of Court is directed to terminate ECF No. 62.

SO ORDERED.



October 14, 2022

Very truly yours,

s/Ex Kano S. Sams II

Ex Kano S. Sams II